



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

September 24, 2015

BY ECF

The Honorable Loretta A. Preska
Chief United States District Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Chambers 2220
New York, New York 10007

**Re: Rajaratnam v. United States,
15 Civ. 5325 (LAP)**

Dear Chief Judge Preska:

The Government writes to respectfully request (1) a one-week enlargement of time—to October 5, 2015—within which to file its opposition to petitioner Raj Rajaratnam's Motion Pursuant to 28 U.S.C. § 2255 and Motion for a Writ of Error Coram Nobis, and (2) permission to file one omnibus opposition to both motions of no more than 50 pages in length.

The Government's opposition to Rajaratnam's motions is currently due on September 28, 2015. As the Court is likely aware, the undersigned did not represent the Government at Rajaratnam's trial. As such, over the last two months, the Assistant U.S. Attorneys now handling this matter have had to familiarize themselves with a trial record in excess of 5700 pages and 600 exhibits. The Government therefore respectfully requests an additional week—to October 5—to finalize its opposition papers. Rajaratnam, through counsel, consents to this request.

If the Court grants that enlargement of time, the parties jointly propose allowing Rajaratnam to file a reply by November 6, 2015.

The Government also respectfully requests that the Court allow it to file one omnibus opposition to both motions of no more than 50 pages. Rajaratnam's memoranda in support of his

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motions together run almost 60 pages. The Government will need up to 50 pages to adequately address Rajaratnam's arguments. Rajaratnam, through counsel, also consents to this request.

Respectfully submitted,

PREET BHARARA
United States Attorney

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